

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Salomon SANCHEZ PEREZ

Case No.

Case: 2:24-mj-30534**Judge: Unassigned,****Filed: 12-17-2024****CMP USA V. SALOMON SANCHEZ****PEREZ (DA)**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 6, 2024 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

8 U.S.C. § 1326(a)

Unlawful Reentry Following Removal from the United States

This criminal complaint is based on these facts:

On or about December 6, 2024, in the Eastern District of Michigan, Southern Division, Salomon SANCHEZ PEREZ, an alien who had previously been removed from the United States on or about June 26, 2024 at or near Brownsville, Texas, was thereafter found in the United States without having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.*Complainant's signature*Michael Everson, US Border Patrol Agent*Printed name and title*

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: 12/17/2024*Judge's signature*City and state: Detroit, MichiganHon. Bernard A. Friedman, United States District Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST
WARRANT**

I, Michael Everson, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security (DHS), United States Border Patrol (USBP). I have been employed in this capacity since December 2011. Currently, I am assigned to the Detroit Border Patrol Station.
2. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and an arrest warrant for Salomon SANCHEZ PEREZ, a native and citizen of Mexico, who has violated Title 8, United States Code, Section 1326(a), Unlawful Reentry Following Removal from the United States.
3. The information contained in this affidavit is based upon my personal knowledge and observations, as well as information provided by other law enforcement officers to include U.S. Border Patrol Agents and record checks of law enforcement databases. I have also reviewed records from the official immigration file and system automated data relating to SANCHEZ PEREZ. I have not included every fact known to law enforcement related to this investigation.

PROBABLE CAUSE

4. SANCHEZ PEREZ is a twenty-seven-year-old citizen and national of Mexico who claimed to have last entered the United States on or around July 2024, at an unknown place, without being inspected and admitted or paroled by an immigration officer.
5. On or about November 10, 2016, U.S. Border Patrol arrested SANCHEZ PEREZ at or near Penitas, Texas after he entered the United States without having been inspected and admitted or paroled. He was processed for an Expedited Removal. On or about November 12, 2016, SANCHEZ PEREZ was removed to Mexico through Brownsville, Texas.
6. On or about June 12, 2018, U.S. Border Patrol arrested SANCHEZ PEREZ at or near Douglas, Arizona and reinstated his prior removal order. On June 13, 2018, SANCHEZ PEREZ was convicted of Improper Entry, in violation of 8

U.S.C. § 1325(a), in the U.S. District Court for the District of Arizona and sentenced to 30 days incarceration. On or about July 12, 2018, SANCHEZ PEREZ was removed from the United States to Mexico for a second time through Nogales, Arizona.

7. On or about August 3, 2018, U.S. Border Patrol arrested SANCHEZ PEREZ near Naco, Arizona and reinstated his prior removal order. On or about August 4, 2018, SANCHEZ PEREZ was removed from the United States to Mexico for a third time through Calexico, California.
8. On or about January 3, 2020, U.S. Border Patrol arrested SANCHEZ PEREZ at or near Otay Mesa, California, following a foot chase, and reinstated his prior removal order. On or about January 4, 2020, SANCHEZ PEREZ was removed from the United States to Mexico for a fourth time through San Ysidro, California.
9. On or about March 5, 2023, North Carolina Highway Patrol in New Hanover, North Carolina arrested and charged SANCHEZ PEREZ with Driving While Impaired (DWI) after dispatch reported a call from a homeowner stating that a car ran off the road into the homeowner's backyard. On or about October 25, 2023, SANCHEZ PEREZ was convicted for DWI and sentenced to 60 days in jail, 24 hours of community service, court fines, and twelve months of unsupervised probation.
10. On or about May 27, 2024, while on probation for his DWI offense in North Carolina, the Troy, Michigan Police Department arrested and charged SANCHEZ PEREZ for Operating While Intoxicated. There is an open bench warrant for failure to appear.
11. On or about May 28, 2024, U.S. Immigration and Customs Enforcement (ICE) arrested SANCHEZ PEREZ and reinstated his prior removal order. On or about June 26, 2024, SANCHEZ PEREZ was removed from the United States to Mexico for a fifth time through Brownsville, Texas.
12. On December 6, 2024, following an investigation, U.S. Border Patrol Agents from the Detroit Station observed SANCHEZ PEREZ leaving his residence in Pontiac, Michigan and driving away in a car. Agents activated their emergency lights and sirens in a marked U.S. Border Patrol vehicle to conduct a stop. SANCHEZ PEREZ refused to stop his car while driving in circles in the neighborhood. The Agents terminated the pursuit and later encountered

SANCHEZ PEREZ getting out of his car in a restaurant's parking lot in Clawson, Michigan. U.S. Border Patrol arrested SANCHEZ PEREZ and transported him to the Detroit Border Patrol Station for processing.

13. The arrest and subsequent detention of SANCHEZ PEREZ was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
14. SANCHEZ PEREZ's fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Integrated Automated Fingerprint Identification System (IAFIS). The results revealed that SANCHEZ PEREZ is a native and citizen of Mexico with the foregoing immigration history who had previously been removed from the United States.
15. A review of SANCHEZ PEREZ's immigration file, record checks, and queries in the U.S. Department of Homeland Security databases confirmed that SANCHEZ PEREZ did not obtain the permission or express consent from the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States following his removal on June 26, 2024.
16. On December 6, 2024, U.S. Border Patrol Agents served SANCHEZ PEREZ with Form I-871, Notice of Intent/Decision to Reinstate Prior Order.

CONCLUSION

17. Based on the above information, I believe there is probable cause to conclude that Salomon SANCEZ PEREZ is native and citizen of Mexico who has previously been removed from the United States on or about June 26, 2024, at or near Brownsville, Texas, and was thereafter found by immigration authorities in the United States, on or about December 6, 2024, in the Eastern District of Michigan, without first having obtained the express consent or permission of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States, all in violation of Title 8, United States Code, Sections 1326(a).



Michael Everson, Border Patrol Agent
U.S. Department of Homeland Security

Subscribed and sworn to before me in my
presence and/or by reliable electronic means.

Bernard A. Friedman

Honorable Elizabeth Stafford
United States Magistrate Judge